

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

Case No. 1:03-md-01570-GBD-SN

ORAL ARGUMENT REQUESTED

*This document relates to:*

*The Underwriting Members of Lloyd's  
Syndicate 2, et al. v. Al Rajhi Bank, et al.,  
No. 16-cv-7853; Aguilar, et al. v. Kingdom of  
Saudi Arabia, et al., No. 16-cv-09663;  
Addesso, et al. v. Kingdom of Saudi Arabia, et  
al., No. 16-cv-09937; Hodges, et al. v.  
Kingdom of Saudi Arabia, et al., No. 17-cv-  
00117; Aiken, et al. v. Kingdom of Saudi  
Arabia, et al., No. 17-cv-00450; Charter Oak  
Fire Insurance Co., et al. v. Al Rajhi Bank, et  
al., No. 17-cv-02651; Abarca, et al., v.  
Kingdom of Saudi Arabia, et al., No. 17-cv-  
03887; Arrowood Indemnity Co., et al. v.  
Kingdom of Saudi Arabia, et al., No. 17-cv-  
03908; Abedhajajreh v. Kingdom of Saudi  
Arabia, et al., No. 17-cv-06123; Fraser, et al.  
v. Al Qaeda Islamic Army, et al., No. 17-cv-  
07317; Muenchener Rueckversicherungs-  
Gesellschaft Aktiengesellschaft in Muenchen, et  
al. v. Kingdom of Saudi Arabia, et al.,  
No. 17-cv-07914; and Abbate, et al. v.  
Kingdom of Saudi Arabia, et al., No. 17-cv-  
08617.*

**DECLARATION OF NICOLE ERB IN SUPPORT OF  
AL RAJHI BANK'S REPLY MEMORANDUM OF LAW**

I, Nicole Erb, declare as follows:

1. I am an active member in good standing of the bar of New York and a Partner in the law firm of White & Case LLP. I am counsel for Defendant Al Rajhi Bank in the above-captioned matter. I have personal knowledge of the facts set forth herein.

2. I submit this declaration in connection with Al Rajhi Bank's Reply Memorandum of Law in Support of Its Renewed Motion to Dismiss.

3. Attached as Exhibit 94 is a true and correct copy of the United States Commission on International Religious Freedom's profile of Salman al-Ouda, obtained from <https://www.uscirf.gov/religious-prisoners-conscience/forb-victims-database/salman-al-ouda> on September 26, 2024.

4. Attached as Exhibit 95 is a true and correct copy of the Deposition Transcript of Aimen Dean, dated February 8, 2024, and the Errata, dated April 11, 2024.

5. Attached as Exhibit 96 is a true and correct copy of the Deposition Transcript of Robert S. Pasley, dated January 31, 2024, and the Errata, dated March 18, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 30, 2024.

/s/ Nicole Erb

Nicole Erb